

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE COVIDIEN PLC SECURITIES
LITIGATION

CASE NO. 1:14-CV-12949-LTS

**PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT**

PLEASE TAKE NOTICE that Lead Plaintiff Rosenfeld Family Foundation, supported by plaintiffs in the consolidated action, Joseph Lipovich and Richard Taxman (collectively, “Plaintiffs”), respectfully moves, on a date convenient to the Court, before the Honorable Leo. T. Sorokin, for an order: (i) granting preliminary approval of the Settlement of the Action as embodied in the Stipulation; (ii) preliminarily certifying a non-opt out class for settlement purposes and appointing class representatives and class counsel; (iii) approving the form and manner of notice of the Settlement to Covidien Shareholders; and (iv) setting a hearing for final approval of the Settlement. This unopposed motion is based upon the accompanying memorandum of law, the Stipulation of Settlement and the accompanying exhibits attached therewith, as well as all prior proceedings held in this action, and other such matters and arguments as the Court may consider.

Respectfully submitted,

Dated: May 15, 2015

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: May 15, 2015

/s/ Mark A. Delaney
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